

EXHIBIT J

Alpha Phi Alpha Fraternity, Inc. v. Raffensperger, Brad

Page 1

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ALPHA PHI ALPHA FRATERNITY,
INC., a nonprofit organization
on behalf of members residing
in Georgia; SIXTH DISTRICT OF
THE AFRICAN METHODIST EPISCOPAL
CHURCH, a Georgia nonprofit
organization; ERIC T. WOODS;
KATIE BAILEY GLENN; PHIL BROWN;
JANICE STEWART,
Plaintiff,

vs.

CASE NO.: 1:21-CV-05337-SCJ

BRAD RAFFENSPERGER, in his
official capacity as Secretary
of State of Georgia,
Defendant.

(Appearance via Vide Conference)

DEPOSITION OF: KATIE BAILEY GLENN

DATE: December 14, 2022

TIME: 1:00 p.m.

LOCATION: Home of Katie Bailey Glenn
[REDACTED]

McDonough, Georgia

tAKEN BY: Counsel for the Defendant

REPORTED BY: Mary K. Stepp, Court Reporter

(Appearance via Video Conference)

Alpha Phi Alpha Fraternity, Inc. v. Raffensperger, Brad

Page 10

1 MR. TYSON: Okay.

2 BY MR. TYSON:

3 Q. All right. Ms. Mitchell, so let me learn
4 a little bit more about you. If you could give us
5 your full -- I'm sorry, Ms. Glenn. If you could give
6 us your full name and your current home address,
7 please.

8 A. My name is Katie Glenn. My home address
9 is [REDACTED] McDonough, Georgia 30253.

10 Q. Okay. And, Ms. Glenn, approximately how
11 long have you lived at the [REDACTED]
12 address?

13 A. I've lived here since 1968.

14 Q. And that address is in Henry County,
15 right?

16 A. Yes.

17 Q. Okay. And have you always lived in Henry
18 County or have you only lived there since 1968, which
19 is definitely plenty of time but...

20 A. Yes. No. I lived elsewhere.

21 Q. Okay. Were those other places in Georgia
22 or were they in other states?

23 A. They were in Georgia.

24 Q. Okay. I don't need a complete list, but
25 do you have a quick rundown of where those other

1 A. Well --

2 MS. MITCHELL: Do you mind rephrasing the
3 question, Bryan?

4 BY MR. TYSON:

5 Q. Certainly. But let me ask it this way,
6 Ms. Glenn. I'm sorry. When you vote in a primary
7 election, do you vote in the Democratic primary or
8 the Republican primary?

9 MS. MITCHELL: Answer.

10 THE WITNESS: Democratic.

11 BY MR. TYSON:

12 Q. Okay. Do you consider yourself to be a
13 member of the Democratic party in Georgia?

14 A. Yes.

15 Q. Have you ever been involved in the Henry
16 County Democratic party in any way, officially,
17 volunteering or in a position?

18 A. Yes.

19 Q. Okay. And what were your roles in the
20 Henry County Democratic Party?

21 A. Simply to observe voting.

22 Q. So you served as a poll watcher before in
23 Henry County?

24 A. Yes.

25 Q. Okay. Have you ever held a leadership

Alpha Phi Alpha Fraternity, Inc. v. Raffensperger, Brad

Page 28

1 not served as a volunteer?

2 A. Yes.

3 Q. Okay. And which campaign did you help out
4 with?

5 A. Democratic.

6 Q. Okay. Was there a particular democratic
7 candidate or was it just helping out with democratic
8 campaigns as a group?

9 A. As a group.

10 Q. Okay. And was that in Henry County or was
11 that for the Georgia Democratic party?

12 A. Henry County.

13 Q. Have you ever -- or do you ever recall
14 voting for a republican candidate for office?

15 A. No.

16 Q. Ms. Glenn, if you're still doing okay, I'd
17 like to start talking about this particular lawsuit.
18 If you're going well. Or we can take a break, if
19 you'd like to. It's up to you.

20 MS. MITCHELL: Do you want to take a
21 break? Are you still doing okay? Let's take a
22 break. Take a quick break, if that's all right.

23 MR. TYSON: Okay. We'll do five minutes.

24 (Recess was taken from 1:46 p.m. to 1:52
25 p.m.)